

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CENTURY INDEMNITY COMPANY (as
Successor to CCI INSURANCE COMPANY, as
successor to INSURANCE COMPANY OF
NORTH AMERICA), INSURANCE COMPANY
OF NORTH AMERICA,

Plaintiffs,

- v. -

CATERPILLAR INC.

Defendants.

Case No. 1:15-cv-04542

PLAINTIFFS' MOTION FOR LEAVE TO FILE EXHIBIT A UNDER SEAL

Plaintiffs Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, and Insurance Company of North America (collectively, "Century") move for leave of Court to file under seal its Memorandum in Support of Motion to Stay the Peoria Action, which is attached as Exhibit A to Century's Position Paper. Century makes this motion out of an abundance of caution because Caterpillar maintains that information from the Confidential Settlement Agreement and Partial Policy Release executed July 15, 1999 (the "1999 Settlement Agreement"), portions of which are quoted in Century's Memorandum, must be kept under seal. For that same reason, Century filed its Memorandum in Support of Motion to Stay under seal in the Peoria County Circuit Court of the 10th Judicial Circuit of Illinois. Century has attempted to meet and confer with Caterpillar over the propriety of sealing the memorandum without success.

Dated: January 29, 2016
Chicago, Illinois

Respectfully submitted,

By: /s/ Vincent S. Weisband

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CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2016, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF and served it by CM/ECF on the following counsel of record.

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